

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**NATIONAL POSTAL POLICY COUNCIL  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS ROBERT CINTRON (USPS-T-1)  
(May 19, 2021)**

The National Postal Policy Council ("NPPC"), pursuant to §3020.117 of the Commission's rules of practice, respectfully submits the following interrogatories, number (NPPC/USPS-T1-1 through 6) to United States Postal Service witness Robert Cintron (USPS-T-1) and requests a timely answer under oath. If an interrogatory can be answered more accurately by a different witness, please redirect it to the appropriate witness.

Please contact the undersigned with any questions.

Respectfully submitted,

NATIONAL POSTAL POLICY COUNCIL

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NPPC/USPS-T1-1: Please refer to page 6, lines 14-16 of your testimony, in which you state that the Postal Service adopted its current market-dominant service standards for First-Class Mail in 2012. Please list any changes the Postal Service has made to its business rules governing First-Class Mail service from 2012 to the present.

NPPC/USPS-T1-2: The Postal Service today has less volume than in 2012, after adoption of the current service standards. While an inability to meet service standards if volume had doubled since then might be understandable, please explain why the Postal Service cannot meet the current standards despite having less volume than in 2012?

NPPC/USPS-T1-3: Is the Postal Service's network today (*i.e.*, prior to implementation of the changes contemplated in this proceeding) optimized for any particular volume of First-Class Mail or total mail? Please explain.

NPPC/USPS-T1-4: For what volume of First-Class Mail would the Postal Service's network be optimized after implementation of the changes contemplated in this proceeding? Please explain.

NPPC/USPS-T1-5: Please refer to page 28, line 18, through page 29, line 9 of your testimony. Please describe what you mean by "Merging these two [the

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First-Class Mail and the NDC] parallel networks,” how will they be merged, and how they will be distinct.

NPPC/USPS-T1-6: Please refer to page 31, footnote 21 of your testimony.

What proportion of remittance mail will be affected by the change to transport remittance volumes together with all other First-Class Mail?